

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

UNITED STATES * DOCKET NO. 11CR27 (ENV)

v. *

MANUEL SALGADO * OCTOBER 19TH, 2011

CONSENT MOTION TO MODIFY CONDITIONS OF PRE TRIAL RELEASE

1.

Mr. Salgado's conditions of Pre Trial release prohibit him from associated with anyone connected to the "waterfront" in New Jersey, where some of the alleged crimes occurred and/or had an effect.

2.

Mr. Salgado has an annuity, retirement and/or 401k account being handled by the waterfront commission and/or his union. He has been unable to work at his job or secure gainful employment And has an immediate need to withdraw some of those funds.

3.

In order to do so he has to go to waterfront commission locations and/or his union hall to execute documents and make the formal request.

4.

Therefore, I am seeking a limited modification allowing Mr. Salgado to go to waterfront commission facilities and/or his union hall as needed and to interact with people there for the sole purpose of dealing with his benefits package, to include vacation day reimbursement if applicable.

5.

I have contacted the Assistant United States Attorney and she has no objection to this limited request being granted.

RESPECTFULLY SUBMITTED,
s/J. Patten Brown, III
J. PATTEN BROWN, III
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CERTIFICATE OF SERVICE

I hereby certify that this Motion to Amend Conditions of Pre Trial Release by J. Patten Brown, III was forwarded electronically via the Court's electronic filing system to all counsel of record this 19th day of October, 2011.

S/J. Patten Brown, III
J. Patten Brown, III
Attorney at Law